

Re: Kinnune v. WA State
Case NO. 2:23-cv-00026-MKD

EXHIBIT Y

Kinnune vs State of Washington, WA DSHS
Frost, Barbara - October 06, 2023

30(b)(6)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ROBERT THEODORE KINNUNE,)	
)	
Plaintiff,)	
)	No. 2:23-cv-00026-MKD
vs.)	
)	
STATE OF WASHINGTON,)	
WASHINGTON STATE DEPARTMENT)	
OF SOCIAL AND HEALTH SERVICES,)	
)	
Defendants.)	

Deposition Upon Oral Examination
of
BARBARA FROST

Taken Via Zoom

8:15 A.M.

DATE: FRIDAY, OCTOBER 6, 2023

Reported by:
Ashley B. Cavdek, CCR, CVR
Washington CCR 22006301

1 highlighted there. Exhibit 26. No specific document
2 is identified there, and I'm not sure if the State is
3 maintaining that. Exhibit 26 to the State's
4 production is about 33,000 pages.

5 As the State's designee, are you aware of
6 any other documents that would be responsive to
7 Interrogatory Number 5 that reflects actions,
8 omissions, behavior, or performance issues with
9 Mr. Kinnune.

10 **A. No.**

11 Q. Who was responsible for scheduling COVID
12 screenings in 2020?

13 **A. Susan Bordges.**

14 Q. Did you have any involvement in scheduling
15 COVID screenings for 2020?

16 **A. We would have a conversation about it.**
17 **Because if we couldn't find enough people, then I**
18 **would help recruit -- including myself doing**
19 **screenings.**

20 Q. Was there any discussion about Mr. Kinnune
21 essentially assuming the COVID temperature check
22 station work exclusively after he returned from
23 military service leave?

24 **A. No.**

25 Q. Okay. And specifically what I mean is

1 Ms. Ross was doing COVID temperature checks in 2020;
2 correct?

3 A. Correct.

4 Q. Okay. And in the month that Mr. Kinnune
5 returned to Eastern State Hospital, was Ms. Ross
6 scheduled to do any COVID screening checks?

7 A. I believe she was. Robert was just filling
8 in on a few times that we didn't have help.
9 Everybody -- everybody did COVID screening tests that
10 we could find that had the time to support it. It
11 wasn't any funded position. So you would see a lot of
12 leadership help. You would see -- after they went
13 through the training, you would see a wide variety of
14 staff that would be at that screening station because
15 we were mandated to provide that for our employees.

16 Q. Yeah. I guess what I'm wondering -- go
17 ahead.

18 A. I was just going to say -- so when Robert
19 came back and he had the time and he agreed that he
20 would have a great opportunity to be able to meet and
21 let, you know -- let the staff know that he's back and
22 to interact with them, he agreed to do that.

23 And he -- I mean, sometimes it would be
24 45 minutes. It wasn't like an all-day schedule. It
25 was 45 minutes or maybe an hour, maybe two hours, and

C E R T I F I C A T E

STATE OF UTAH)
) ss.
COUNTY OF UTAH)

I, the undersigned Washington Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify: That the foregoing deposition of the witness named herein was taken stenographically before me and reduced to a typed format under my direction;

That, according to CR 30(e), the witness was given the opportunity to examine, read, and sign the deposition after same was transcribed, unless indicated in the record that the review was waived;

That I am not a relative or employee of any attorney or counsel or participant and that I am not financially or otherwise interested in the action or the outcome herein;

That the witness coming before me was duly sworn or did affirm to tell the truth;

That the deposition as transcribed is a full, true and correct transcript of the testimony, including questions and answers and all objections, motions, and examinations, and said transcript was prepared pursuant to the Washington Administrative Code 308-14-135 preparation guidelines;

That as a matter of firm policy, the stenographic notes of this transcript will be destroyed three years from the date appearing on this transcript, unless notice is received otherwise from any party or counsel on or before said date.

s/ASHLEY B. CAVDEK, CCR, CVR
State of Washington CCR 22006301
My CCR certification expires on 03/21/24